



PERSONAL DATA PROCESSING POLICY OF CÍTRICOS DEL POLANCO S.A.S.

1. Preliminary Note

This document sets out the Personal Data Processing Policy (hereinafter the “Policy”) of natural persons (hereinafter the “Holders”) of CÍTRICOS DEL POLANCO S.A.S, in accordance with the provisions of Law 1581 of 2012, “By means of which the general provisions for the protection of personal data are issued” and Decree 1377 of 2013.

The main purpose of this Policy is to inform the Holders of personal data processed by the Company, the rights, procedures adopted to enforce those rights and purposes for which their data will be processed in the event of granting express, prior and informed consent to the Company.

2. Responsible for Processing

The Company is responsible for processing personal data of the Holders from whom the Company obtains consent, on which the Company shall decide directly and autonomously.

Your contact information is:

Domicile: [•]

Address: [•]

Email: [•]

Telephone: [•]

3. Processing

Processing of personal data of the Holders by the Company involves the collection, storage, organization, use, distribution, transmission, transfer, update, rectification, elimination and in general the execution of any transaction on the same, in accordance with the purposes set forth in this Policy and for which the Company has received authorization.

3.1. Processing of personal data of children and/or adolescents. Processing of personal data that is not of public nature of children and/or adolescents will comply with the following parameters and requirements:

- a) To respond and respect the best interest of children and adolescents.
- b) To ensure the respect of their fundamental rights.
- c) To value the minor’s opinion when the latter has the maturity, autonomy and ability to understand the matter.
- d) To have the authorization for the processing of personal data by the representative or guardian of the child or adolescent.

3.2. Processing of sensitive data. The Company will apply the legal limitations to the processing of personal data, therefore will ensure that:



- a) The Holder has given his express consent for such processing, except in those cases where the granting of such consent is not required by law.
- b) The Processing is needed to safeguard the vital interest of the Holder and the latter is physically or legally incapacitated, in which case the legal representatives shall grant their consent.
- c) The Processing is carried out in the course of legitimate activities and with all due guarantees by a foundation, NGO, association or any other non-profit organization, whose purpose is political, philosophical, religious or trade union, provided that the same refer exclusively to its members or to individuals who maintain regular contact due to their purpose. In these cases, data may not be provided to third parties without the Holder's consent.
- d) The Processing relates to data that is needed for the recognition, exercise or defense of a right in a legal process, or
- e) The processing has an historical, statistical or scientific purpose.

4. Purposes

The Company will process personal data according to the following purposes and the holder's capacity:

Investors, Employees and Contractors. Data will be processed to manage the contracting, development and termination of the business, labor or civil relationship between the investors, employees, contractors and the Company.

Clients: Data will be processed in order to carry out all activities needed for the development of the corporate purpose of the Company.

Suppliers: Data will be processed to contact and contract suppliers, manage the adequate fulfillment of the subject matter and obligations of a contract concluded with the relevant supplier, and in general, to carry out all activities needed by virtue of the civil or business relationship that arises between the supplier and the Company.

Applicants for job offers: Personal data will be processed in order to, directly or indirectly, carry out the personnel selection processes and hiring of employees to the Company.

General Public: Data will be processed to carry out, directly or indirectly, and by any means, marketing and/or commercialization activities of services or products of the Company.

In addition to the purposes described above, the Company will process personal data of Holders in order to comply with legal and regulatory obligations to which the Company is subject, as well as other purposes for which the Holders grant their consent in the collection process of personal data. Managers or third parties who have access to personal data by virtue of the Law or a contract, will process data exclusively for the aforementioned purposes.



5. Term of Processing

The term of the processing of personal data will be equal to the period in which the purpose or purposes are in force, or the term specifically set forth in a legal, contractual or jurisprudential cause.

6. Consent

Except for the cases defined in Law 1581 of 2010, Decree 1377 of 2013, and other regulations that regulate, add, execute, complement, modify, delete or derogate them, in the cases where prior consent of the Holder is required, the Company will request the same at the time of collecting the information.

Consent shall be express, either verbally, written or by means of an unequivocal and informed behavior, in the sense of including the specific purposes for processing for which consent is requested and obtained by any means that may be subject of subsequent consultation.

7. Rights of Holders

In accordance with the law, the Holders of personal data have the following rights:

a) To know, update and rectify their personal data in relation to the Company, in its capacity as Responsible for the Processing and in relation to Data Processors. The rights to update and rectification may be exercised, among others, in relation to partial, inaccurate, incomplete, fractioned and misleading data, or that whose processing is expressly prohibited or has not been authorized in the terms provided for by Law 1581 of 2012 (or in its absence in the regulations that regulate, add, execute, complement, modify, delete or derogate the same).

b) To request the proof of the consent granted to the Company, except when expressly exempted as a requirement for the processing, in accordance with the provisions of Article 10 of Law 1581 of 2012 (or in its absence in the regulations that regulate, add, execute, complement, modify, delete or derogate the same).

c) To be informed by the Company or Data Processor, upon request, regarding the use given to their personal data.

d) To submit complaints to the Superintendence of Industry and Commerce for infractions of the provisions of Law 1581 of 2012, after the consultation or claim procedure before the Company has been exhausted.

e) To withdraw the consent and/or request the deletion of data when the processing does not respect the constitutional and legal principles, rights and guarantees. The withdrawal and/or deletion shall proceed when the Personal Data Protection Authority of Colombia has determined that the Person/Processor responsible for the processing have incurred in conducts contrary to Law 1581 of 2012 and/or the Constitution.

The request for deletion of information and withdrawal of the consent shall not proceed when the holder has a legal or contractual duty to remain in the



database or the Responsible Processor has the legal or contractual duty to continue with the processing.

f) To access, free of charge, their personal data that is subject to processing. The Holders may consult, free of charge, their personal data: (i) at least once every calendar month, and (ii) every time there are substantial modifications to the information processing guidelines that motivate the holders to make new queries.

8. Procedures for Holders to exercise their rights

In accordance with the subject matter of the Policy, the rights of the holders are: knowledge, access, rectification, update, withdrawal and deletion of their personal data (provided that there is no legal, jurisprudential or contractual mandate that entitles the Company to continue the processing).

The Holders may exercise their rights through consultation or complaint sent to the email [•].

8.1. Procedure for Consultation

The Holders may submit a consultation to the email [•] when they wish to access or consult their personal data stored in any database of the Company, for which they shall attach a copy of their ID document. If the person making the consultation is a legal representative and/or attorney-in-fact of a holder, said legal representative and/or attorney-in-fact shall attach a copy of the ID document and document accrediting the capacity in which said legal representative and/or attorney-in-fact is acting (power of attorney).

The consultation, presented according to the above, shall be answered in a maximum term of ten (10) business days from the date of receipt of the same. When the consultation cannot be answered within said term, the Company will inform the interested party of said situation, explaining the reasons for the delay and stating the date on which their consultation will be answered, which in no case may exceed five (5) working days following the expiration of the first term.

8.2. Claim Procedure

The Holders may submit a claim to the email [•] when they consider that the information contained in any database of the Company should be subject to correction, update or deletion, or when they notice an alleged breach of any of the duties set forth in Law 1581 of 2012 or Decree 1377 of 2013.

The claim shall contain the identification of the holder, description of the facts giving rise to the claim and address, and a copy of the ID document and if the person making the consultation is a legal representative and/or attorney-in-fact of a holder, said legal representative and/or attorney-in-fact shall attach a copy of his/her ID document and the document accrediting the capacity in which said legal representative and/or attorney-in-fact is acting (power of attorney). In addition, all other documents needed to be asserted shall be attached to the claim.



If the claim is incomplete, the Company, within five (5) business days following the receipt of the claim, shall request the interested party to correct the faults. If after two (2) months from the date of the request, the petitioner has not presented the required information, it will be understood that the claim has been withdrawn. In the event that the party receiving the claim is not competent to resolve it, the claim shall be transferred to the appropriate party within a maximum period of two (2) business days and shall inform the interested party of the situation.

Once the complete claim has been received, within a term of not more than two (2) business days, a legend that says “claim in process” and the grounds shall be included in the database. Said legend shall remain in place until the claim is decided. The maximum term to answer a claim shall be fifteen (15) business days from the day following the date of receipt of the claim. When the claim cannot be answered within said term, the Company will inform the interested party of said situation, explaining the reasons for the delay and stating the date on which their claim will be answered, which in no case may exceed eight (8) business days following the expiration of the first term.

9. Database security measures

The information subject to processing by the Company shall be subject to technical, human and administrative measures needed to ensure the security of the records preventing their adulteration, loss, consultation, use, unauthorized or fraudulent access.

10. Duration of the Policy

This Personal Data Processing Policy is effective as of June 1, 2018.

PRIVACY NOTICE AND EXPRESS AUTHORIZATION FOR PERSONAL DATA PROCESSING

In compliance with Law 1581 of 2012, “Personal Data Protection” and in accordance with the provisions of Decree 1377 of 2013, for the Company CÍTRICOS DEL POLANCO S.A.S (hereinafter the “Company”) filling in the form [•], constitutes for the Company an unequivocal statement, which does not admit doubt or error, and allows the Company to conclude in a reasonable manner that you granted your prior, expressed and informed consent for the processing of personal data contained therein by the Company,

The information obtained will be used for:

Investors, Employees and Contractors: Data will be processed to manage the contracting, development and termination of the business, labor or civil relationship between the investors, employees, contractors and the Company.

Clients: Data will be processed in order to carry out all activities needed for the development of the corporate purpose of the Company.

Suppliers: Data will be processed to contact and contract suppliers, manage the adequate fulfillment of the subject matter and obligations of a contract concluded



with the relevant supplier, and in general, to carry out all activities needed by virtue of the civil or business relationship that arises between the supplier and the Company.

Applicants for job offers: Personal data will be processed in order to, directly or indirectly, carry out the personnel selection processes and hiring of employees to the Company.

General Public: Data will be processed to carry out, directly or indirectly, and by any means, marketing and/or commercialization activities of services or products of the Company.

In addition to the purposes described above, the Company will process personal data of Holders in order to comply with legal and regulatory obligations to which the Company is subject, as well as other purposes for which the Holders grant their consent in the collection process of personal data. Also, the Company informs you that your rights as the holder of personal data are: (i) To access, free of charge, to the data provided that has been subject to processing. (ii) To know, update and rectify your information in relation to partial, inaccurate, incomplete, fractioned and misleading data, or that whose processing is expressly prohibited or has not been authorized. (iii) To request the proof of the consent granted. (iv) To submit complaints to the Superintendence of Industry and Commerce (SIC as per its acronym in Spanish) for infractions of the legislation in force. (v) To withdraw the consent and/or request the deletion of data, provided that there is no legal or contractual duty that prevents the deletion of data. (vi) To refrain from answering questions on sensitive data. Answers concerning sensitive data or data on children and adolescents are optional.

The “Manual of Policies and Procedures for the Protection of Personal Data” is available for consultation on the web site [•]. To resolve doubts and concerns related to data processing, submit your requests and/or exercise your rights, you may write to the email [•].

CONSENT TO PERSONAL DATA PROCESSING

In compliance with Law 1581 of 2012 “Protection of Persona Data” and in accordance with the provisions of Decree 1377 of 2013, we kindly request to our suppliers, contractors and employees to freely, expressly, prior, informed and voluntarily authorize the processing of your personal data to the company CÍTRICOS DEL POLANCO S.A.S (hereinafter the “Company”).

Such consent will allow the Company to collect, use, process, store, update and delete your personal data, solely and exclusively for the purposes related to the corporate purpose of the Company pursuant to the Personal Data Processing Policy, which is available for consultation on the website [•].

The Company guarantees the confidentiality, freedom, security, veracity, transparency, access and restricted distribution of information.

If in the term of thirty (30) business days from the receipt of this communication the Company has not received from you any request to delete or correct your



personal data, the Company will understand that you authorize to continue using your information in accordance with the Company's Policies and as set out in this email.